

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

September 19, 2001

Mr. Anthony Wong
AFBCA/DM
3411 Olson Street, Room 105
McClellan, CA 95652

Re: **Draft Final FOST for Subparcels A-1; A-3 through A-7; A-17 through A-25; A-27;
B-11; C-7; C-8; C-17; C-21; D-2; D-12; D-14 through D-16; G-1; G-3; H-1;
Southern Portion of C-3 and D-13; Southeast Portion of C-20**

Dear Mr. Wong:

Thank you for the opportunity to review the subject document received by our office on September 14, 2001. We reviewed your response to our comments and had the following comments:

General Comments:

- (1) The AOC site, original skeet range, should have been dropped out of the FOST similar to the dieldrin groundwater contamination investigation for subparcels that were excluded from the SEBS. Since both areas of concern require further site investigations, the same consistent management approach should apply.
- (2) Our comment on page 5, regarding our request for deletion of an extraneous paragraph, was not completed as cited by the Air Force. Please delete the paragraph beginning with "Covenants will be included . . ."
- (3) Thank you for a copy of the Sumiden deed, but there is some important deed restriction language missing. On May 13, 1998, EPA provided the following FOST comments: "EPA believes that post-demonlition sampling should be conducted prior to any reuse which could potentially expose children to residual lead contamination. Reuse of the property for residential or child occupancy purposes should, therefore, be restricted unless or until soil testing for lead is conducted after demolition." The Air Force (AF) should confirm if any sampling was performed after the old structures were demolished. If no sampling has been done, the AF should consider conducting its own sampling to support the FOST process. This is an example why regulatory agencies should review the draft deed to ensure applicable concerns are addressed.

Regretfully, EPA cannot concur with the FOST until the applicable concerns are adequately addressed. If you have any questions, please call me at (415) 744-2158.

Sincerely,

James Chang
Remedial Project Manager

cc:

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